

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced	)	
E911 Emergency Calling Systems	)	
	)	

To: The Wireless Telecommunications Bureau

**Carrier Report of Wireless Communications Venture Regarding  
Implementation of Wireless E911 Phase II Automatic Location Identification**

In response to the telephone request of Pat Forster of the Federal Communications Commission's ("FCC" or "Commission") Wireless Telecommunications Bureau, Wireless Communications Venture ("WCV") hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI").

**I. Background / Contact Information**

WCV serves rural Minnesota and its contact information is as follows:

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Manager

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**II. E911 Phase II Location Technology Information**

WCV has chosen to pursue a hybrid (handset/network)-based technology to achieve ALI compliance with equipment to be provided by Nortel. The technology uses both cell sector identification and GPS. The location technology also uses a locating function within or as an overlay to the wireless network infrastructure using a combination of Time Difference of Arrival and Angle of Arrival. WCV intends to deploy its hybrid solution throughout its service area.

### **III. Testing and Verification**

WCV has yet to test its ALI solution since it is still waiting on the Nortel product. In addition, WCV has not been able to test any handsets since none are available and WCV has yet to be given a date when ALI-capable handsets will be available. WCV anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of the technology it eventually chooses.

### **IV. Implementation Details and Schedule**

While WCV is awaiting product availability from Nortel and handset vendors, it has developed a tentative implementation schedule to meet the both FCC's handset-based rules and network-based rules. WCV will begin selling ALI-capable handsets on October 1, 2001 and it will begin providing handset information to the PSAP by December 31, 2001. WCV anticipates that by August 25, 2001 it will be able to provide network-based location information to the PSAP.

### **V. PSAP Interface**

WCV has yet to receive a Phase II PSAP request. WCV will need to upgrade its software to an MTX10 feature addition and add location center hardware in order to transmit Phase II data to PSAPs. WCV plans to subcontract the work necessary to upgrade its towers and install the necessary software.

### **VI. Handset Information**

WCV will run promotions in order to replace existing handsets. The price of the new ALI-capable handsets, unavailable at this time, will affect WCV's replacement strategy.

### **VII. Other Information**

WCV notes that the remote and rural nature of its service territory in Minnesota can present additional and unforeseen problems when installing and testing location technology. WCV would have a much better handle on how it will eventually implement its Phase II plan if the vendor products were available for testing. Unfortunately, WCV's Phase II implementation plan depends, in large part, upon the schedules and plans of the vendors.

March 13, 2001